

Mail - Annamarie Trombetta - Outlook

Exhibit #1

Norb Novocin Deposition Full Production of Exhibit #4 -2 Page eBay email

Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Sat 10/29/2022 2:27 PM

To: ajd@hoganduff.com <ajd@hoganduff.com>; Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

Email  
to A. Duff

8 attachments (13 MB)

Ebay Item Sold for 1972 Painting --EAI000058-EAI000059.pdf; EXHIBIT 4 Norb Novocin Deposition. JPG.JPG; Norb Novocin Deposition Page 74.jpg; Norb Novocin Deposition Page 75.jpg; Norb Novocin Deposition Page 76.jpg; Norb Novocin Deposition Page 77.jpg; Norb Novocin Deposition Page 78.jpg; Norb Novocin Deposition Page 79.jpg;

Mr. Duff and to all parties,

Attached is are pages 74 to 79 of the September 21, 2022 Novocin Deposition. WorthPoint attorneys requested identified and called for the production of the two page December 1, 2012 email sale for the 1972 Original Oil Painting titled Man With Red Umbrella.

Production of this two page document labeled Exhibit 4 and also EAI00058 amd EAI00059 is requested immediately . Failure to produce these two documents will be noted to the Court in a letter on October 31, 2022.

Submitted October 29, 2022

Annamarie Trombetta

Exhibit #1



Exhibit # 2  
Page 1

Page 74

1 N. NOVOCIN

2 A. I couldn't find it. I e-mailed  
3 it to myself.

4 MS. FARMER: To the extent not  
5 already produced, we will call for  
6 the production of the copy of the  
7 listing that your son was able to  
8 find. We will make a request of Mr.  
9 Duff.

10 Q. Mr. Novocin, this document,  
11 Defendant's Exhibit 4 that we are looking  
12 at, that appears to be an e-mail address to  
13 you, correct?

14 A. Yes.

15 Q. It appears to be from Ebay,  
16 EAI?

17 A. Correct.

18 Q. Is that the typical e-mail that  
19 you would receive from Ebay when one of  
20 your listings would sell?

21 A. No. Let me -- the one further  
22 down would be, yes, where it says,  
23 "Congratulations, your item sold", all of  
24 that would be a typical one that we had  
25 from Ebay, yes.



Exhibit # 2  
Page 2

Page 75

N. NOVOCIN

Q. I take it the top e-mail is for the earlier notification, correct?

A. Correct.

Q. Did you ask Ebay to be sent to you that sales notification from 2012?

A. No.

Q. How did you happen to get the January 10, 2017 e-mail?

A. We would have gone through our old e-mails and got a copy of it from other old e-mails. We don't throw e-mails away.

Q. When it says Ebay, EAI, does that indicate it came from Ebay or some other company?

A. It came from us, Estate Auctions Incorporated.

Q. This is initially you forwarding your old e-mail to yourself?

A. Correct.

Q. To your knowledge, does your e-mail server, if they are familiar with somebody's e-mail address, do they brief it so the A sign is not visible?

A. Yes.



Exhibit # 2  
Page 3

Page 76

1 N. NOVOCIN

2 Q. It would make sense that your  
3 e-mail system knows your other e-mail  
4 addresses, correct?

5 A. Correct.

6 Q. Now, the e-mail below it,  
7 December 1, 2012, it is from Ebay.com,  
8 correct?

9 A. Correct.

10 Q. You received that e-mail from  
11 Ebay at Ebay@Novocin.com, correct?

12 A. Correct.

13 Q. Was that the e-mail that you  
14 personally used, somebody else in your  
15 company or something else?

16 A. One of the company e-mails  
17 yeah.

18 Q. Who has access to these  
19 e-mails?

20 A. The list of people that I gave  
21 you earlier all have access to that e-mail.

22 Q. Are you by any chance still in  
23 possession of the original file for this  
24 e-mail? Not the pdf, but the actual  
25 e-mail.



Exhibit #2  
Page 77 Page 4

1 N. NOVOCIN

2 A. I don't know. I would have to  
3 go and check. I don't know if we still  
4 have that, if Ebay@Novocin.com goes back  
5 that far.

6 Q. Do you see towards the bottom  
7 of this document, there appears to be a  
8 section that's a little bit cut off. Do  
9 you see that?

10 A. Yes.

11 Q. I'm going to ask if you can go  
12 back and check if the original e-mail file,  
13 if you still have it, might have this  
14 information without being cut off. If so,  
15 I would ask of you to please provide us  
16 with a copy that's not cut off. Okay?

17 A. That's okay. I'm pretty sure  
18 we have a copy. In fact, this one here  
19 might be a copy of it. When you create  
20 pdfs, sometimes pdf cut it off. I can get  
21 that.

22 MR. DUFF: What's the part  
23 that's cut off?

24 (Whereupon, an off the record  
25 discussion was held).



Exhibit #2  
Page 5

Page 78

N. NOVOCIN

Q. Mr. Novocin, does the domain  
Ebay@Novocin.com still exist?

A. Yes.

Q. Was there a server associated  
with this domain?

A. Multiple.

Q. Do these servers still exist?

A. A lot of the servers that we  
had to switch, we lost all the previous  
photos on. We switched it to a different  
server while keeping Novocin, but we didn't  
switch over the millions of photos that  
were on it.

Q. When was Ebay@Novocin.com  
created?

A. A long time ago. I don't know.

Q. Was it before top of the 2008  
page, to your knowledge?

A. Yes, it was before 2008, yes.

Q. This document, Defendant's  
Exhibit 4, does it indicate to you the  
price for which the painting Man With A Red  
Umbrella was sold?

A. Well, it's cut off, but yeah,



Exhibit # 2  
Page 6

Page 79

N. NOVOCIN

it says, "Sale price, 181.5". I'm pretty sure it's 181.50.

Q. It indicates the buyer is ~~Nina~~ something?

A. Yes.

Q. Does it indicate that the person who bought this painting resides in Reno?

A. ~~Yes, Nevada~~, yes.

Q. To your knowledge, is that true, the purchaser was named Nina and she resides in Reno, Nevada?

A. Yes.

Q. Is that the person that you spoke to to try to get the photos of the painting?

A. Yes.

Q. When you were composing the listing for this painting, did you call Worthpoint to discuss that with them?

A. I don't think I was a member of Worthpoint at that time.

Q. Did Worthpoint have any input whatsoever to what you put into the listing



Exhibit # 3

Wednesday, April 27, 2022 at 21:30:09 Eastern Daylight Time

**Subject:** Fwd: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)

**Date:** Tuesday, January 10, 2017 at 5:28:43 PM Eastern Standard Time

**From:** eBay EAI

**To:** Norb Novocin, marie novocin

Ebay A!  
Page 1

----- Forwarded message -----

From: eBay <[ebay@ebay.com](mailto:ebay@ebay.com)>

Date: Sat, Dec 1, 2012 at 9:54 PM

Subject: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)

To: [ebay@novocin.com](mailto:ebay@novocin.com)

eBay

eBay sent this message to Norb & Marie Novocin (estateauctionsinc).  
Your registered name is included to show this message originated from eBay. [Learn more.](#)

## Congratulations, your item sold!

Dear estateauctionsinc,

You did it! Your item sold. Please ship this item to the buyer after your buyer pays. As soon as your buyer pays, print Complete one of the following:

- [Print a shipping label](#) Avoid a trip to the post office, print and pay for your label at home. Printing shipping labels automatically.
- [Provide shipping and tracking information](#) When you upload tracking information to eBay, we'll send it to the buyer. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.
- [Mark your item as shipped in My eBay](#) Do this, and we'll let your buyer know the item is on its way. This will result in fewer questions from buyers and higher detailed seller ratings.

You should always [leave feedback](#) for your buyer to encourage them to buy from you again.

1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz

[1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz](#)

**Sale price:** \$181.11

Quantity sold: 1

Sale date: Dec-01

Buyer: nina c

9nack

[\[contact\]](#)

Buyer's shipping address: nina c

14215

reno, NV

[Sell another item](#) | [Send invoice](#)

## Select your email preferences

- Want to reduce your inbox email volume? [Receive this email as a daily digest.](#)
- For other email digest options, go to [Notification Preferences](#) in My eBay.
- Don't want to receive this email? [Unsubscribe from this email.](#)



Exhibit #3

Email reference id: [#45d0df16f2ea40759d3656f834970b06#]

Please don't remove this number. eBay customer support may ask you for this number, if you should need assistance.

EbayB

[Learn More](#) to protect yourself from spoof (fake) emails.

eBay sent this email to you at [ebay@novocin.com](mailto:ebay@novocin.com) about your account registered on [www.ebay.com](http://www.ebay.com).

eBay sends these emails based on the preferences you set for your account. To unsubscribe from this email, change your [communication preferences](#). Please note that it may take up to 10 days to process your request. Visit our [Privacy Policy](#) and [User Agreement](#) if you have any questions.

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page 2





Annamarie Trombetta &lt;atrombettaart@gmail.com&gt;

**Request for copy Docket 282 and Plaintiff's response due on September 22, 2022**

Annamarie Trombetta &lt;atrombettaart@gmail.com&gt;

To: Anderson Duff &lt;ajd@hoganduff.com&gt;, "Farmer, Jana S." &lt;jana.farmer@wilsonelser.com&gt;, "Bialek, Adam" &lt;Adam.Bialek@wilsonelser.com&gt;, "Haimson, Nicole" &lt;nicole.haimson@wilsonelser.com&gt;

Fri, Sep 23, 2022 at 5:56 AM

To Mr. Duff,

Plaintiff is requesting that all my discovery responses set forth in my September 19th letter in Doc. 180 to the Court be answered in completion.

I am requesting a copy of Docket 282 due to your failure to send Plaintiff the letter addressed to Judge Cave. Kindly send your September 22, 2022 letter to Plaintiff as soon as possible.

Submitted September 23, 2022 at 6 a.m.

Annamarie Trombetta

Exhibit #4  
page 1





Annamarie Trombetta <atrombettaart@gmail.com>

**Request for copy Docket 282 and Plaintiff's response due on September 22, 2022**

**Annmarie Trombetta <atrombettaart@gmail.com>**  
To: Anderson Duff <ajd@hoganduff.com>, "Farmer, Jana S." <jana.farmer@wilsonelser.com>, "Bialek, Adam" <Adam.Bialek@wilsonelser.com>, "Haimson, Nicole" <nicole.haimson@wilsonelser.com>  
Fri, Sep 23, 2022 at 10:20 AM

To Mr. Duff,

Plaintiff is requesting that all my discovery responses set forth in my September 19th letter in Doc. 280 to the Court be answered in completion.

I am requesting a copy of Docket 282 due to your failure to send Plaintiff the letter that is addressed to Judge Cave. Kindly send your September 22, 2022 letter to Plaintiff as soon as possible.

Submitted September 23, 2022 at 10:20 a.m.

Annamarie Trombetta

[Quoted text hidden]

Exhibit #4  
Page 2



Gmail - Follow Up of Third Subpoena

Exhibit #5



Annamarie Trombetta <atrombettaart@gmail.com>

## Follow Up of Third Subpoena

~~Nina G. Trombetta~~ <atrombettaart@gmail.com>

Mon, Nov 7, 2022 at 3:14 PM

To: Annamarie Trombetta <atrombettaart@gmail.com>

I have no written proof of payment for man with red umbrella  
Measurements (I bought a custom frame for the painting)  
Length with frame 50 and 3/4 inches  
Width with frame 19 and 5/8 inches  
Length to the best of my ability without frame 48 and 1/4 inches  
Width without frame 17 and 1/8 inches

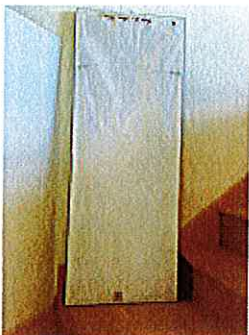
Sent from my iPad

On Nov 6, 2022, at 8:51 AM, Annamarie Trombetta <atrombettaart@gmail.com> wrote:

[Quoted text hidden]

From  
Buyer of  
1972  
Oil Man With  
Red Umbrella

### 4 attachments



Back of Painting.HEIC  
518K

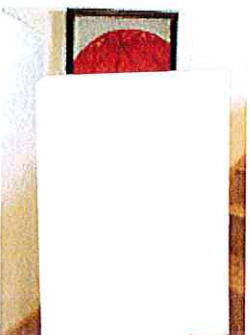


Image Man With Red Umbrella IMG\_0246.HEIC  
620K